

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE:	:	
Kira J. Brown	:	Chapter 13
	:	Case No.: 21-11457-AMC
Debtor(s)	:	

MOTION TO MODIFY PLAN AFTER CONFIRMATION

Debtor, Kira J. Brown, by and through the undersigned counsel, hereby moves this Honorable Court to Modify their Chapter 13 Plan and in support thereof avers as follows:

1. Debtor filed a Chapter 13 Petition on August 10, 2018.
2. The Chapter 13 Plan was confirmed on May 21, 2021.
3. The debtor fell behind on payments due to the Chapter 13 Trustee due to an unexpected loss of employment.
4. The debtor is now gainfully employed and avers future payments will be remitted in a timely manner.
5. Debtor has paid \$3,200.00 to the Chapter 13 Trustee to date.
6. The Modified Chapter 13 Plan will provide for plan payments in the amount of \$445.00 per month for the remaining 49 months for a new base amount of \$25,005.00.
7. The debtor is aware they must remain current on all ongoing payments due to the Chapter 13 Trustee to avoid future attempts by the Trustee to dismiss the case.

WHEREFORE, Debtor, by the undersigned counsel, respectfully requests this Honorable Court to enter an Order Modifying the Chapter 13 Plan with a new base amount of \$25,005.00.

Dated: May 13, 2022

/s/Brad J. Sadek, Esq
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